

## REMARKS

The Office Action dated February 23, 2005, has been carefully reviewed and the foregoing amendment has been made in response thereto. Claims 1-15 are pending in the application.

The rejection of claims 1-15 under 35 USC 112, second paragraph, is respectfully traversed. The Examiner's suggestions relating to the lack of clarity of "redirecting a destination" have been incorporated into claim 1, and claim 8 has been amended in a similar way. Although it is not believed that the recitation of "apparatus" in the preamble is inconsistent with a network having multiple components, claims 1-7 have been amended to recite a "network system" in order to facilitate prosecution. It is submitted that claims 1-15 are in conformance with 35 USC 112 and that the rejection should be withdrawn.

The rejection of claims 1-3, 8, 10, and 11 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications is respectfully traversed. Claims 1 and 8 recite service selection gateway(s) which redirect user traffic (e.g., packets) having a nominal destination by sending queries to an address server associating logical names for service-option resources with respective numerical network addresses. The system of claim 1 and the method of claim 8 allow certain changes to be made in service option resources without requiring reconfiguring of the service selection gateways.

Zhang fails to disclose any details concerning the manner in which user traffic is redirected after a user has been authenticated. There is no suggestion in Zhang for any access point or gateway to refer to any of the available services using logical names. Clearly there is no teaching in Zhang of an address server storing a respective logical name corresponding to each numerical network address of a service-option resource.

The addition of RAD Data Communications fails to demonstrate prima facie obviousness. The DNS system discussed in RAD uses logical names for human use that are related to numerical addresses for use by computers. As stated on page 2 of

RAD, “IP addresses are hard for us, humans, to remember and we prefer to use meaningful names, which we are used to refer to in the everyday life.” In contrast, the present invention stores logical names within the service selection gateway for use by the service selection gateway to look-up a numerical address for a particular service option resource. A human (i.e., the service user) need not remember or even know either the numerical address or the logical name associated with the service option resource since it is used only by and within the service selection gateways and their connected resources.

Since it is not hard for the service selection gateways to remember a numerical address for the service-option resources, it is clear that the address server of the present invention is fulfilling an entirely different purpose – which is to make reconfiguration of service-option resources possible without making any changes to the service selection gateways. Therefore, there is no motivation to modify Zhang by adding an address server having logical names for services to which particular user traffic may be redirected by an SSG.

The rejection employs impermissible hindsight in an attempt to reconstruct the elements of the claimed invention. The fact that a DNS-like address server has advantages in the claimed context is not sufficient to show motivation to combine the DNS system of RAD with the service selection gateway of Zhang. The address look-up function of the SSG of the present invention does not involve human memory and employs service-option resource addresses that are completely transparent to a user (e.g., the address of a firewall within the network through which the user’s traffic is redirected without the user being aware of it). Thus, claims 1-3, 8, 10, and 11 are allowable over the cited references.

The rejection of claims 4-6 and 12-14 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications and further in view of Li et al is respectfully traversed. Li fails to correct for the deficiencies of Zhang and RAD noted above. Therefore, claims 4-6 and 12-14 are likewise allowable.

The rejection of claims 7 and 15 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications and further in

view of Brown et al is respectfully traversed. Brown fails to correct for the deficiencies of Zhang and RAD noted above. Therefore, claims 7 and 15 are likewise allowable.

The rejection of claim 9 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications and further in view of Bero is respectfully traversed. Bero fails to correct for the deficiencies of Zhang and RAD noted above. Therefore, claim 9 is likewise allowable.

In view of the foregoing amendment and remarks, claims 1-15 are now in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,

A handwritten signature in cursive script, reading "Mark L. Mollon". The signature is written in dark ink and is positioned above a horizontal line.

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